UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

JENNIFER KASILAG, et al.,

Plaintiffs,

Civil No. 1:11-cv-01083-RMB-KMW

v.

HARTFORD INVESTMENT FINANCIAL SERVICES, LLC,

Defendant.

JENNIFER KASILAG, et al.,

Plaintiffs,

Civil No. 1:14-cv-01611-RMB-KMW

v.

HARTFORD FUNDS MANAGEMENT COMPANY, LLC,

Defendant.

JENNIFER KASILAG, et al.,

Plaintiffs,

v.

HARTFORD FUNDS MANAGEMENT COMPANY, LLC,

Defendant.

Civil No. 1:15-cv-01876-RMB-KMW

NOTICE OF MOTION DEFENDANTS' MOTION TO
(1) STRIKE PLAINTIFFS' DEMANDS FOR A JURY TRIAL,
AND (2) PRECLUDE PLAINTIFFS FROM OFFERING EVIDENCE
AT TRIAL OF "LOST INVESTMENT EARNINGS"

TO: Robert L. Lakind, Esq.
SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, P.C.
101 Grovers Mill Road, Suite 200
Lawrenceville, New Jersey 08648

Andrew W. Robertson, Esq. ZWERLING, SCHACHTER & ZWERLING, LLP 41 Madison Avenue New York, New York 10010

PLEASE TAKE NOTICE that on June 6, 2016 at 9:00 AM, or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants, Hartford Investment Financial services, LLC and Hartford Funds Management Company, LLC shall move before the United States District Court for the District of New Jersey, Mitchell H. Cohen Courthouse, 4th & Cooper Streets, Camden, NJ 08101 for an Order granting Defendants' Motion to (1) Strike Plaintiffs' Demands for a Jury Trial, and (2) Preclude Plaintiffs from Offering Evidence at Trial of "Lost Investment Earnings."

PLEASE TAKE FURTHER NOTICE that in support of its motion, Defendants shall rely upon the accompanying Memorandum of Law in support of the motion. A Proposed Order is also enclosed; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested in the event the motion is opposed.

Dated: May 4, 2016

MILBANK, TWEED, HADLEY & McCLOY LLP

Sean M. Murphy (pro hac vice) Robert C. Hora (pro hac vice) 28 Liberty Street New York, NY 10005-1413 (212) 530-5000 Of Counsel SHERMAN WELLS SYLVESTER & STAMELMAN LLP

By: /s/ Anthony Sylvester
Anthony Sylvester
210 Park Avenue, 2nd Floor
Florham Park, NJ 07932
(973) 302-9700
Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2016, a copy of the Notice of Motion and supporting papers were served <u>via</u> ECF upon all counsel of record.

By: /s/Anthony J. Sylvester
Anthony J. Sylvester

Dated: May 4, 2016